

EXHIBIT A

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

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PROPOSED ATTORNEYS FOR DEBTOR

In re:

LTL MANAGEMENT LLC,¹

Debtor.

LTL MANAGEMENT LLC,

Plaintiff,

v.

THOSE PARTIES LISTED ON APPENDIX A TO
COMPLAINT and JOHN AND JANE DOES 1-1000,

Defendants.

Chapter 11

Case No.: 23-12825 (MBK)

Judge: Michael B. Kaplan

Adv. No.: 23-01092 (MBK)

**DEBTOR'S FIRST SET OF INTERROGATORIES
TO ARNOLD & ITKIN LLP AND ARNOLD & ITKIN LLP ACTING FOR ARNOLD &
ITKIN TALC CLAIMANTS**

¹ The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

Pursuant to Rule 33 of the Federal Rules of Civil Procedure, made applicable to this contested matter² by Rules 7033 and 9014 of the Federal Rules of Bankruptcy Procedure, LTL Management LLC, the above-captioned debtor (“the Debtor”), by its proposed undersigned counsel, hereby requests that Arnold & Itkin answer under oath the interrogatories specified below in accordance with a schedule agreed upon by the parties or ordered by the Court.

DEFINITIONS

1. The term “communication” means the transmittal of information (in the form of facts, ideas, inquiries or otherwise) including but not limited to any oral or written transmittal and/or receipt of facts, information, thoughts, inquiries, opinions, including, without limitation, meetings, conversations in person, telephone conversations, records of conversations or messages, telegrams, telexes, facsimile transmissions, electronic mail transmissions, letters, reports, memoranda, formal statements and press releases, and newspaper stories. References to communications with business entities shall be deemed to include all officers, directors, employees, agents, attorneys, accountants, consultants, independent contractors, or other representatives of such entities.

2. The term “all communications” shall mean each and every communication, whether an original or copy, known to you or which you can locate or discover by reasonably diligent effort, within your custody, possession or control, or the custody, possession or control of your present or former attorneys, accountants, insurance carriers, representatives, employees and/or agents.

² The contested matter is the *Motion of the Official Committee of Talc Claimants to Dismiss the Second Bankruptcy Petition of LTL Management, LLC*, Dkt. 286, and all other motions to dismiss to this bankruptcy, including Arnold & Itkin on behalf of certain personal injury claimants (Dkt. 384).

3. The terms “concern” or “concerning” shall mean, refer to, allude to, related to, connected with, in respect of, about, regarding, discussing, showing, evidencing, describing, in support of, in substitution of, reflecting, and analyzing.

4. The term “Ad Hoc Comm. Info. Brief” means the *Information Brief of the Ad Hoc Committee of Certain Talc Claimants Regarding Second Bankruptcy Filing by LTL Management, LLC*, Dkt. 79.

5. The term “Arnold & Itkin” means the law firm Arnold & Itkin LLP and all of its lawyers, advisors, and any person authorized to act on of its behalf, as well as certain personal injury claimants represented by Arnold & Itkin.

6. The term “LTL 2.0” shall mean *In re LTL Management LLC*, Case No. 23-12825 (MBK) and/or the affiliated adversary proceedings, including Adv. Proc. No. 23-01092.

7. The term “MDL *Daubert* Decision” shall mean Judge Freda Wolfson’s April 27, 2020 in *In re: Johnson & Johnson Talcum Powder Products Marketing, Sales Practices and Products Litigation*, MDL No. 2738, Civ. No. 16-2738 (FLW) (D.N.J.).

8. The term “person” is defined as any natural person or any legal entity, including, without limitation, any business or governmental entity or association, a group of natural persons acting in a collegial capacity (e.g., as a committee, board of directors), an entity, including without limitations sole proprietorship, firm, association, company, partnership, joint venture corporation or division or subsidiary thereof, trust, estate, and other incorporated or unincorporated business.

9. The term “Proposed \$8.9 Billion Settlement” shall mean the Debtor’s proposal, as set forth in the Term Sheet attached to the Plan Support Agreements, to resolve all current and future Talc Claims for a \$8.9 billion net present value, payable over 25 years.

10. The term “Talc Claims” shall mean current and future talc-related claims or other proceedings involving the Debtor or any of its affiliates, including without limitation personal injury claims filed by individual claimants, claims asserted by governmental units, claims asserted by third-party payors, and claims for indemnification against the Debtor or any its affiliates.

11. The term “Arnold & Itkin Talc Claims” means the Talc Claims (filed or unfiled) for which Arnold & Itkin serves as lead counsel, including without limitation any Talc Claims brought (or intended to be brought in the future) by certain personal injury claimants represented by Arnold & Itkin.

12. The term “TCC” means the Official Committee of Talc Claimants, the Ad Hoc Committee of Certain Talc Claimants, each of the TCC’s counsel and advisors, the members of the TCC, or any person authorized to act on of the behalf of the TCC.

13. The term “TCC Mot. Dismiss” means the *Motion of the Official Committee of Talc Claimants to Dismiss the Second Bankruptcy Petition of LTL Management, LLC*, Dkt. 286.

14. The term “TCC PI Obj.” means the *Objection of the Official Committee of Talc Claimants to Debtor’s Motion for an Order (I) Declaring that the Automatic Stay Applies or Extends to Certain Actions Against-Non Debtors, (II) Preliminary Enjoying Such Actions, and (III) Granting a Temporary Restraining Order Ex Parte Pending a Hearing on a Preliminary Injunction*, Adv. Dkt. 39.

15. The term “United States Trustee” shall mean the Office of the United States Trustee and any person authorized to act on its behalf.

16. Plural words include the singular equivalent, and singular words include the plural equivalent.

17. The term “and” includes the disjunctive “or,” and “or” includes the conjunction "and."

INSTRUCTIONS

1. The masculine or feminine gender of any word shall be construed to include the masculine, feminine and neuter genders.
2. The past tense of any verb shall embrace and be applied as the present tense, or as the context requires or as applicable, and vice versa.
3. Each interrogatories is to be construed and considered to act independently, and is not to be referenced to any other interrogatories for purposes of limitation.

INTERROGATORIES

INTERROGATORY NO. 1: Identify the total number of Arnold & Itkin Talc Claims, filed and unfiled.

RESPONSE:

INTERROGATORY NO. 2: Identify any settlement demands, including without limitation any statutory demands, that Arnold & Itkin has made with respect to any individual or group of Arnold & Itkin Talc Claims.

RESPONSE:

INTERROGATORY NO. 3: Identity the amounts Arnold & Itkin believes would be adequate to provide fair compensation to any, all, or any subset of the Arnold & Itkin Talc Claims.

RESPONSE:

INTERROGATORY NO. 4: Identify the average per-claim settlement amount that Arnold & Itkin believes would be adequate to provide fair compensation to any, all, or any subset of the Arnold & Itkin Talc Claims and the basis for such an average.

RESPONSE:

INTERROGATORY NO. 5: Identify any estimates Arnold & Itkin has developed, shared, or discussed concerning the dollar-value of the aggregate liability attributable to the Arnold & Itkin Talc Claims.

RESPONSE:

INTERROGATORY NO. 6: Identify any estimates Arnold & Itkin has developed, shared, or discussed concerning the dollar-value of the aggregate liability attributable to all or any subset of the Arnold & Itkin Talc Claims.

RESPONSE:

INTERROGATORY NO. 7: Identify any estimates Arnold & Itkin has developed, shared, or discussed concerning the dollar amount required to defend all or any subset of Talc Claims in the tort system.

RESPONSE:

INTERROGATORY NO. 8: Identify any estimates Arnold & Itkin has developed, shared, or discussed concerning the dollar amount required to resolve all or any subset of Talc Claims in the tort system.

RESPONSE:

INTERROGATORY NO. 9: Identify any estimates Arnold & Itkin has developed, shared, or discussed concerning the number of Talc Claims that will be filed in the future.

RESPONSE:

INTERROGATORY NO. 10: Identify any estimates Arnold & Itkin has developed, shared, or discussed concerning the dollar-value attributable to Talc Claims asserted by government units.

RESPONSE:

INTERROGATORY NO. 11: Identify any estimates Arnold & Itkin has developed, shared, or discussed concerning dollar-value attributable to Talc Claims asserted by third-party payors.

RESPONSE:

INTERROGATORY NO. 12: Identify the number of Arnold & Itkin Talc Claims you expect to be set for trial within the next two years as well as the jurisdictions where you expect trial settings.

RESPONSE:

INTERROGATORY NO. 13: Identify any witness the Arnold & Itkin expects or may call to provide fact or expert testimony at the hearing on the motions to dismiss.

RESPONSE:

Dated: May 6, 2023

WOLLMUTH MAHER & DEUTSCH LLP

/s/ Paul R. DeFilippo

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